



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 3, 2023

BY ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Patel, 23 Cr. 543 (LGS)

Dear Judge Schofield:

Pursuant to the Court's November 1, 2023, Order ([Dkt. 8](#)), the parties jointly propose the following schedule:

December 4, 2023	Rule 16 discovery by the Government ¹
March 4, 2024	Defense motion(s) other than motions in limine or <i>Daubert</i> motions
March 18, 2024	Government opposition
March 25, 2024	Defense reply
April 1, 2024	Potential status conference dates
April 2, 2024	
April 3, 2024	

With the defendant's consent, the Government respectfully requests, pursuant to [18 U.S.C. § 3161\(h\)\(7\)](#), that time be excluded from today until the date of the pretrial conference, to permit

¹ A substantial number of electronic devices were seized pursuant to a warrant when the defendant was arrested on October 31, 2023, and it is possible that the unlocking, extraction, and review of those devices might require additional time.

the defense to review the discovery, make any motions, and consider a possible pretrial disposition in this case.

Respectfully submitted,

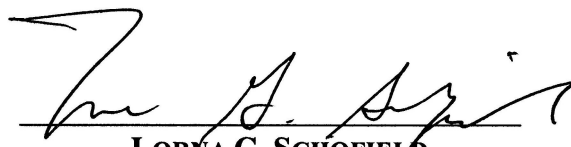
DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

by: /s/Kevin Mead
Kevin Mead
Assistant United States Attorney
(212) 637-2211

CC: Counsel of Record (by ECF)

Application Granted. The Government shall produce any Rule 16 discovery in its possession by **December 4, 2023**. The Government shall file a status letter regarding the seized electronic devices on **December 15, 2023, and February 2, 2024**. Defendant's motion(s) shall be filed by **March 4, 2024**. The Government's response shall be filed by **March 18, 2024**. Defendant's reply shall be filed by **March 25, 2024**. The parties shall appear for a status conference on **April 22, 2024, at 10:30 a.m.** The Court finds that the ends of justice served by excluding the time between today and April 22, 2024, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. § 3161(h)(7)(A) because the exclusion will give Defendant time to review the discovery, file any motions, and allow the parties to discuss a potential pretrial disposition. It is hereby ORDERED that the time between today and April 22, 2024, is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 10.

Dated: November 8, 2023
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE